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Attorneys for Defendant The Hertz Corporation

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ZABEENA MAHARAJ, on behalf of Plaintiff  
and all others similarly situated,

Plaintiff,

v.

THE HERTZ CORPORATION,

Defendant.

Case No. 3:23-cv-04726-JSC

HON. JACQUELINE SCOTT CORLEY

**JOINT CASE MANAGEMENT  
STATEMENT RE STATUS OF  
DISCOVERY NEEDED FOR  
MEDIATION**

Dept.: Courtroom 8 – 19th Floor

1 Defendant The Hertz Corporation (“Hertz” or “Defendant”) and Plaintiff Zabeena Maharaj  
2 and Plaintiff Rodolfo Schulz (“Plaintiffs”) (collectively, the “Parties”) submit this Joint Case  
3 Management Statement re Further Case Management Conference pursuant the Court’s Order of  
4 June 20, 2024.

5 **1. STATUS OF DISCOVERY**

6 On March 28, 2024, the parties submitted their Joint Case Management Statement re  
7 Mediation. [Doc. No. 35.] In their statement, the parties advised the Court that both parties are  
8 agreeable to private mediation, which they seek to schedule by September of 2024. [Doc. No. 35,  
9 at 2:11-12.] Parties are in the process of choosing the neutral. Plaintiff further advised the Court  
10 that in advance of the mediation, Plaintiff will require information (either through formal or  
11 informal discovery) to calculate damages for the proposed class. [Id. at 2:9-10.]

12 On February 21, 2024 Plaintiff propounded Requests for Production of Documents and  
13 Interrogatories seeking the following information needed for mediation: (i) policies and  
14 procedures regarding payment of wages, providing meal and rest breaks, paying overtime,  
15 clocking in and out (ii) class time punch and payroll records (iii) correspondence to class members  
16 about any of the above wage and hour issues (iv) policies and procedures concerning any  
17 exemptions to wage and hour laws Defendant contends apply. On April 19, 2024 Defendant  
18 provided responses.

19 The parties are meeting and conferring regarding those responses.

20 On June 25, 2024 Plaintiff filed Second Amended Complaint to add a representative  
21 plaintiff Rodolfo Schulz defining a separate class consisting of “Customer Service Manager”.  
22 [Doc. No. 42].

23 Plaintiff anticipates propounding Requests for Production of Documents and  
24 Interrogatories seeking above-described information as to “Consumer Service Managers” as well.

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28 ///

1 Dated: August 8, 2024

Respectfully submitted,

2  
3 /s/ Vahan Mikayelyan

4 Joshua H. Haffner  
5 Alfredo Torrijos  
6 Vahan Mikayelyan  
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23 Dated: August 8, 2024

Respectfully submitted,

24 /s/ Zain Zubair

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